

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: THOMAS A. FINK	: No. 19-12720
Debtor	:
	: Chapter 13
	:
Freedom Mortgage Corp.	:
v.	:
	:
Thomas A. Fink,	:
Debtor	:
	:
Grace Fink, Co-Debtor	:

Response to Motion for Relief filed by **Freedom Mortgage Corp.**

Debtors, by and through their attorney, responds as follows:

Debtor has been approved for a forbearance.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly
402 Middletown Blvd.
Suite 202
Langhorne, Pa. 19047
215-741-1100
mpk@cowanandkelly.com